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March 14, 2014

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -  
JUNIOR WALKER and TAHERA BULLEN-WALKER, on behalf  
of themselves and on behalf of their infant  
children T.W. and N.W.,

Plaintiffs,

Index No.  
12-CV-2535 (WFR) (MDG)

-against-

THE CITY OF NEW YORK, STACEY ROBINSON, Caseworker,  
New York City Administration of Children's  
Services, in the individual and the official  
capacities, GLADYS WHITE, Supervisor, New York  
City Administration of Children Services, in her  
individual and official capacities, JACQUELINE  
MCKNIGHT, Assistant Commissioner-Brooklyn,  
New York City Administration of Children Services  
in her individual and official capacities, SHARON  
ROGERS, Deputy Director for Brooklyn Field Office,  
Zone E, New York City Administration of Children  
Services in her individual and official capacities  
BURTON LEWIS, Supervisor, New York City  
Administration of Children's Services, in his  
individual and official capacities, KAREN  
SAWYER-BARRO, Supervisor, New York City  
Administration of Children's Services in her  
individual and official capacities, NATARSKY  
LOUISSAINT, Caseworker, New York City  
Administration of Children Services in her  
individual and official capacities and JOHN  
MATTINGLY, former Commissioner of the New York  
City Administration of Children Services in his  
individual and official capacities,

Defendants.

- - - - -  
100 Church Street  
New York, New York 10007

March 14, 2014  
1:14 p.m.  
(Continued on next page.)

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2 EXAMINATION BEFORE TRIAL of the Defendant, KAREN  
3 SAWYER-BARRO, taken by the Plaintiffs, in the  
4 above-entitled action, held at the above time and  
5 place, pursuant to Order, taken before Lauren  
6 Mele, a shorthand reporter and Notary Public  
7 within and for the State of New York.

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2                   A p p e a r a n c e s:

3 KATHY POLIAS, ESQ.  
4 Attorneys for Plaintiffs  
5 68 Jay Street  
Brooklyn, New York 11201  
BY: KATHY POLIAS, ESQ.  
FILE #: None

7           GEORGIA MCCARTHY  
8           Attorneys for Plaintiffs  
9           902 East 86th Street  
BY:        Brooklyn, New York 11236  
9           GEORGIA MCCARTHY, ESQ.  
FILE #: None

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11  
12 ZACHARY V. CARTER  
13 CORPORATION COUNSEL  
14 Attorneys for Defendants  
15 100 Church Street, 4th Floor  
16 New York, New York 10007  
17 BY: CHARLES CAREY, ESQ.  
18 FILE #: None

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2 F E D E R A L S T I P U L A T I O N S

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IT IS HEREBY STIPULATED AND AGREED by and  
between (among) counsel for the respective  
parties herein, that filing and sealing be and the  
same are hereby waived.

7

8 IT IS FURTHER STIPULATED AND AGREED that  
9 all objections, except as to the form of the  
10 question, shall be reserved to the time of the  
11 trial.

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13 IT IS FURTHER STIPULATED AND AGREED that  
14 the within deposition may be sworn to and signed  
15 before any officer authorized to administer an  
16 Oath, with the same force and effect as if signed  
17 and sworn to before the Court.

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2 K A R E N S A W Y E R - B A R R O , the witness  
3 herein, having been first duly sworn by a Notary  
4 Public of the State of New York, was examined and  
5 testified as follows:

6 EXAMINATION BY

7 MS. POLIAS:

8 Q State your name for the record, please.

9 A Karen Sawyer-Barro.

10 Q State your business address for the  
11 record, please.

12 A 1200 Waters Place, Bronx, New York 10461.

13 Q Good afternoon, Ms. Sawyer. My name is  
14 Kathy Polias, and I am an attorney who represents  
15 plaintiffs Junior Walker and Tahera Bullen-Walker  
16 as well as their minor children in a case  
17 currently pending in the eastern district of  
18 New York against the City of New York and some  
19 other employees, including yourself. With me  
20 today is my co-counsel, Georgia McCarthy.

21 Today I will be asking you some questions  
22 regarding our claims and what I understand the  
23 defendants' defenses to be. If I ask a question  
24 that you don't understand, please free to ask me  
25 to rephrase it. If I am speaking too quickly or

1 KAREN SAWYER-BARRO

2 Q What other documents are sent to the  
3 state?

4 A There is a rap, risk assessment profile,  
5 that's due within thirty days. The rap is due.  
6 That's again something you do within the context  
7 of the investigation. You are clicking around the  
8 rap is due.

9 At the conclusion of 60 days, if the  
10 family preventative services, every six months,  
11 there is another reassessment family assessment  
12 service profile. There are many different ways  
13 that the work is monitored, but then also that the  
14 state is communicated with around what service the  
15 family is getting, what the status of their  
16 investigation was, you know, etc., etc.

17 Q I'm putting before you what's been marked  
18 as Plaintiff's Exhibit 6 as of today.

19 A Okay.

20 Q Have you had an opportunity to review  
21 that document?

22 A No.

23 Q Tell me when you finish reviewing it.

24 A Okay.

25 Q Do you recognize Plaintiff's Exhibit 6?

1 KAREN SAWYER-BARRO

2 A Yes.

3 Q When was the first time that you saw it?

4 A A few moments ago.

5 Q So today was the first time that you saw  
6 Plaintiff's Exhibit 6?

7 A Yes.

8 Q Is it correct to say that you were not  
9 consulted within the preparation of Plaintiff's  
10 Exhibit 6?

11 A Yes. This is created F.C.L.S., the  
12 attorney at family Court.

13 Q Let me direct your attention to the last  
14 two pages of the exhibit.

15 Before today, have you ever seen  
16 JW491-92?

17 A No.

18 Q Do you recall Stacey Robinson consulting  
19 with you about any written statements that she  
20 gave for the petition, the Article 10 petition?

21 A Yes. Well, I'm certain she may have said  
22 something. I don't remember what she talked about  
23 right before Court. I don't think so.

24 Q Did Ms. Robinson or Gladys White, during  
25 the Article 10 proceeding, consult with you on any

1 KAREN SAWYER-BARRO

2 aspects of the proceeding?

3 A Yes.

4 Q What did they consult with you about?

5 A Just, you know, their desire to follow  
6 through. I mean, Mrs. White was the supervisor,  
7 so this was a fairly routine of her job. I  
8 wouldn't have gotten in the nitty gritty. There  
9 wouldn't many questions she had of me.

10 Many times the first time they go to  
11 Court, they would be accompanied by the  
12 supervisor, because they are new. So most likely  
13 Mrs. White would have been sitting there with her.  
14 While I don't remember she's calling me back and  
15 saying something, I can't believe.

16 Q When you were a manager, did you play any  
17 role in the proceeding?

18 A Certainly. I would support the team,  
19 talk with them about it. I had an open door  
20 policy. If you have any questions about how the  
21 whole process works in general, not a problem.  
22 Come and talk to me about it. I'm sure that I  
23 supported her efforts to show Ms. Robinson how to  
24 file a case, how to communicate with the  
25 attorneys, etc. etc. So yes, I was there as a

1 KAREN SAWYER-BARRO

2 support, as overall. I approved what they were  
3 doing. I felt it was the right approach.

4 Q Did it come to your attention at any  
5 point that ACS decided not to proceed with the  
6 Article 10 petition against the Aunt?

7 A I don't recall.

8 Q Did it come to your attention at any  
9 point that plaintiff Junior Walker asked the  
10 central registry to do a review of the case?

11 A I don't -- no, no.

12 Q I'm putting before you Plaintiff's  
13 Exhibit 7, which is a nine page document.

14 A Okay.

15 Q Do you recognize this document,  
16 Plaintiff's Exhibit 7?

17 A Now that I am reviewing it, I'm sure I  
18 recognize it.

19 Q Have you ever seen this document before  
20 today?

21 A No.

22 Q Did it ever COME to your attention that  
23 the central registry found that the allegations  
24 against Junior Walker were unsubstantiated?

25 A In the course of preparing for this, yes.

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1 KAREN SAWYER-BARRO

2 C E R T I F I C A T E

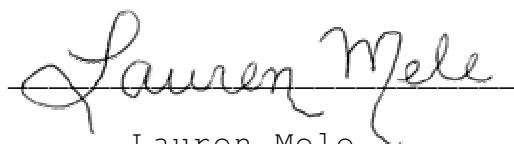
3 I, Lauren Mele, a shorthand reporter and  
4 Notary Public within and for the State of  
5 New York, do hereby certify:

6 That the witness(es) whose testimony is  
7 hereinbefore set forth was duly sworn by me, and  
8 the foregoing transcript is a true record of the  
9 testimony given by such witness(es).

10 I further certify that I am not related to  
11 any of the parties to this action by blood or  
12 marriage, and that I am in no way interested in  
13 the outcome of this matter.

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Lauren Mele

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